

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA



FILED

9-16-16
04:59 PM

Order Instituting Rulemaking To
Enhance the Role of Demand Response
in Meeting the State's Resource
Planning Needs and Operational
Requirements.

Rulemaking 13-09-011
(Filed September 19, 2013)

NOTICE OF EX PARTE COMMUNICATION OF THE JOINT DR PARTIES

Pursuant to Rule 8.4 of the Commission's Rules of Practice and Procedure, the Joint DR Parties (Comverge, Inc., CPower, EnerNOC, Inc., and EnergyHub) hereby give notice of the following ex parte communication.

The communication occurred at 3:45 p.m. on Tuesday, September 13, 2016. The communication was oral and took place at the California State Building, 455 Golden Gate Avenue, San Francisco, California 94102.

The communication was initiated by Jennifer Chamberlin, Executive Director Market Development/CAISO, for CPower, with Matthew Tisdale, advisor to Commissioner Michel P. Florio. No one else was present at the time of the communication.

Ms. Chamberlin stated that the Joint DR Parties would be filing Comments on the Proposed Decision of Administrative Law Judge (ALJ) Hymes Adopting Guidance for Future Demand Response Portfolios and Modifying Decision (D.) 14-12-024 (Proposed Decision), which was mailed on August 30, 2016. Ms. Chamberlin stated that the Joint DR Parties largely support the Proposed Decision, but hope to meet with Mr. Tisdale as a group after Comments are filed to discuss some needed modifications. Ms.

Chamberlin explained, however, that she would not be able to join in that meeting and wished to bring to the Commission's attention one issue, in particular.

Specifically, with reference to the Proposed Decision's determinations on the prohibition on Back-Up Generation (BUG) in DR programs, Ms. Chamberlin noted that certain aspects of that determination may prove problematic for distributed generation (DG). Ms. Chamberlin stated that the Proposed Decision adopts solutions for a customer that also has on-site DG that, for operational purposes and not for demand response, runs almost continuously.

According to Ms. Chamberlin, the Proposed Decision's first solution, to net it out, works for small motors, such as health and safety motors that are turned on to enable a facility shut down. However, Ms. Chamberlin stated that netting is an issue for a larger DG resource and a facility that is also capable of a smaller load drop from curtailments. Ms. Chamberlin stated that, in that case, netting could result in no potential DR. With respect to the second option, not running the DG during any event, Ms. Chamberlin advised that, although that might seem appropriate on the surface, that option has unintended consequences. To address these issues and avoid these outcomes, Ms. Chamberlin stated that the Joint DR Parties would propose clarifying modifications to the Proposed Decision.

To obtain a copy of this notice, please contact:

Sara Steck Myers
Attorney at Law
Telephone: (415) 387-1904
FAX: (415) 387-4708
E-mail: ssmyers@att.net

Respectfully submitted by:

September 16, 2016

/s/ SARA STECK MYERS

Sara Steck Myers

On Behalf of the Joint DR Parties

122 – 28th Avenue
San Francisco, CA 94121
(415) 387-1904 (Telephone)
(415) 387-4708 (FAX)
ssmyers@att.net (Email)